## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Brandon W. Weiss : Chapter 13

: No.: 20-14005-ELF

Debtor(s) :

## **OBJECTION TO CERTIFICATE OF DEFAULT**

Debtor, Brandon W. Weiss, by and through their undersigned counsel Brad J. Sadek, hereby objects to LoanCare, LLC's Certificate of Default on the following basis:

Debtor denies Movant's claims that timely payments were not made per the Stipulation of Settlement. Debtor avers they are gathering all proofs of payment and requests Movant's full accounting to compare the same.

WHEREFORE, Debtor respectfully requests this Honorable Court to DENY Movant's Order requesting Relief from the Automatic Stay.

Dated: March 10, 2022 /s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor(s)

Sadek & Cooper

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